

1 Joel E. Tasca
 Nevada Bar No. 14124
 2 Joseph Dagher
 Nevada Bar No. 15204
 3 BALLARD SPAHR LLP
 1980 Festival Plaza Drive, Suite 900
 4 Las Vegas, Nevada 89135
 Telephone: (702) 471-7000
 5 Facsimile: (702) 471-7070
 E-mail: tasca@ballardspahr.com
 6 E-mail: dagherj@ballardspahr.com

7 *Attorneys for Defendants Café De*
Manila, LLC; Millie Cadag and Homer
 8 *Tuazon*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 JOE HAND PROMOTIONS, INC., a
 Pennsylvania corporation,

12 Plaintiff,

13 v.

14 CAFÉ DE MANILA, LLC, a Nevada,
 15 limited liability company d/b/a CAFÉ DE
 MANILA; MILLIE CADAG, an
 16 individual; and HOMER TUAZON, an
 individual,

17 Defendants.
 18

CASE NO. 2:22-cv-001086-CDS-DJA

STIPULATION AND ORDER TO
 EXTEND TIME FOR DEFENDANT TO
 RESPOND TO PLAINTIFF'S
 COMPLAINT

(First Request)

19 Defendants' response to Plaintiff Joe Hand Promotions, Inc.'s ("Plaintiff")
 20 complaint was due on November 4, 2022. Defendants and Plaintiff agree that
 21 Defendants have up to and including November 28, 2022, to respond to Plaintiff's
 22 complaint. Good cause and excusable neglect under LR IA 6-1 exists because the
 23 defendants require additional time to investigate plaintiff's allegations and for the
 24 parties to discuss a potential early resolution of the claims asserted against
 25 Defendants in this matter.
 26
 27
 28

BALLARD SPAHR LLP
 1980 FESTIVAL PLAZA DRIVE, SUITE 900
 LAS VEGAS, NEVADA 89135
 (702) 471-7000 FAX (702) 471-7070

1
2 This is the first request for an extension, and it is made in good faith and not
3 for purposes of delay.

4 DATED this 10th day of November, 2022.

5 BALLARD SPAHR LLP

GILE LAW GROUP

6
7 By: /s/ Joseph Dagher

By: /s/ Ryan Gile

8 Joel E. Tasca
9 Nevada Bar No. 14124
10 Joseph Dagher
11 Nevada Bar No. 15204
12 1980 Festival Plaza Drive, Suite 900
13 Las Vegas, Nevada 89135

Ryan Gile
Nevada Bar No. 8807
1180 N. Town Center Drive, Suite 100
Las Vegas, Nevada 89144
(702) 703-7288
rg@gilelawgroup.com

14 *Attorneys for Defendants*

Attorneys for Plaintiff

15 **ORDER**

16 IT IS SO ORDERED:

17
18 
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: November 14, 2022